



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20461

RQ-2

OCT 19 1994

William J. McManus, Treasurer
Republican National Committee - RNC
310 First Street, SE
Washington, DC 20003

Identification Number: C00003418

Reference: August Monthly Report (7/1/94-7/31/94)

Dear Mr. McManus:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule H3 of your report discloses transfers received from your non-federal account for fundraising activity which occur outside the permissible transfer period. Please be advised that transfers for shared activity must be made within a 70-day time period: no more than 10 days before or 60 days after the payment to the vendor. 11 CFR §§106.5(g)(2) and 106.6(e)(2). Please clarify the nature of these transfers-in from the non-federal account.

The Commission recommends that you immediately transfer the total amount received by your federal account outside the 70-day time period back to your non-federal account. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

-Schedule B supporting Line 22 (pertinent portion(s) attached) discloses \$12,000.00 in disbursements to the RNSEC for a transfer. You are advised that 11 CFR §102.5 prohibits a non-federal account from financing activity in connection with federal elections. Please provide clarifying information regarding these transactions including the date(s) when the original activity was conducted by the non-federal account. In addition, if any of the disbursements disclosed on Schedule B supporting Line 22 were made to influence the election or defeat of specific federal candidates, the disbursements should be allocated accordingly and disclosed as either in-kind contributions on Schedule B